

# EXHIBIT G

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Filed on behalf of STMicroelectronics, Inc.

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UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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STMICROELECTRONICS, INC.  
Petitioner

v.

THE TRUSTEES OF PURDUE UNIVERSITY  
Patent Owner

IPR2022-00309  
U.S. Patent No. 8,035,112

**PETITION FOR *INTER PARTES* REVIEW OF  
U.S. PATENT NO. 8,035,112  
CHALLENGING CLAIMS 1, 6, 7, and 10–12  
UNDER 35 U.S.C. § 312 AND 37 C.F.R. § 42.104**

Petition for *Inter Partes* Review  
of U.S. Patent No. 8,035,112

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## IX. CLAIM CONSTRUCTION

During IPR, claims are construed according to the “*Phillips* standard.” *Phillips v. AWH Corp.*, 415 F.3d 1303 (Fed. Cir. 2005) (en banc); 83 Fed. Reg. 51341 (Oct. 11, 2018). The Board need only construe the claims when necessary to resolve the underlying controversy. *Toyota Motor Corp. v. Cellport Sys., Inc.*, IPR2015-00633, Paper No. 11 at 16 (Aug. 14, 2015); *Nidec Motor Corp. v. Zhongshan Broad Ocean Motor Co.*, 868 F.3d 1013, 1017 (Fed. Cir. 2017). Here, given the close correlation between the asserted prior art and the challenged claims of the ’112 patent, the Board need not construe any terms of the challenged claims to resolve the underlying controversy, as any reasonable interpretation of those terms consistent with their plain meaning (as would have been understood by a POSITA at the time of the invention, having taken into consideration the language of the claims, the specification, and the prosecution history of record) reads on the prior art.<sup>4</sup>

## X. SPECIFIC GROUNDS FOR UNPATENTABILITY

Under 37 C.F.R. § 42.104(b)(4)–(5), the following sections (as confirmed in Dr. Subramanian’s declaration, EX1002, ¶¶60–133) detail the grounds of

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<sup>4</sup> Petitioner reserves all rights to raise claim construction and other arguments in this and other proceedings as relevant and appropriate.

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**CERTIFICATE UNDER 37 CFR § 42.24(d)**

Under the provisions of 37 CFR § 42.24(d), the undersigned hereby certifies that the word count for the foregoing Petition for *Inter Partes Review* totals 13,797, which is less than the 14,000 words allowed under 37 CFR § 42.24(a)(1)(i).

Respectfully submitted,

Dated: December 17, 2021

/Scott Bertulli/  
Scott Bertulli  
Reg. No. 75,886

Petition for *Inter Partes* Review  
of U.S. Patent No. 8,035,112

**CERTIFICATE OF SERVICE**

I hereby certify that on December 17, 2021, I caused a true and correct copy  
of the foregoing materials:

- Petition for *Inter Partes* Review of U.S. Patent No. 8,035,112 under 35 U.S.C. § 312 and 37 C.F.R. § 42.104
- Exhibit List
- Exhibits for Petition for *Inter Partes* Review of U.S. Patent No. 8,035,112 (EX1001–EX1023)
- Power of Attorney
- Fee Authorization
- Word Count Certification Under 37 CFR § 42.24(d)

to be served via Express Mail on the following correspondent of record as listed on  
PAIR:

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DATED: December 17, 2021

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